

MEYER LAW GROUP LLP

A Limited Liability Partnership
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Attorneys for Debtor in Possession
66 BARRY LANE, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

66 BARRY LANE, LLC,

Debtor in Possession.

BK Case No.: 23-51443-DM

Chapter 11

**STATUS CONFERENCE STATEMENT
FILED BY DEBTOR IN POSSESSION**

Date: July 26, 2024
Time: 10:00 a.m.
Location: Telephonic / Videoconference¹
Judge: Hon. Dennis Montali

¹ See <https://www.canb.uscourts.gov/sites/default/files/announcements/SF%20Division%20Hearing%20Procedures%20%28as%20of%209.1.2023%29.pdf> (All “hearing[s] will not be conducted in the presiding judge’s courtroom but instead will be conducted by telephone or video.”)

Debtor in Possession 66 Barry Lane, LLC ("Debtor") hereby submits this *Status Conference Statement* in advance of the continued Status Conference in the above-captioned matter. Escrow has closed for the sale of residential real property commonly known as 66 Barry Lane, Atherton, California 94027 (the "Barry Lane Property"), which is the sole asset of significant value for the estate. See Dkt. No. 44. As such, there is no need for Debtor to file or prosecute a Chapter 11 Plan of Reorganization.

Further, Debtor (and other related entities and individuals) and Sarah L. Little, Chapter 7 Trustee for the Bankruptcy Estate of Naramin Teymourian (the "Chapter 7 Trustee") recently entered into an agreement to purchase all of the estate's rights, title, and interest in certain disputed claims (the "Agreement"), including each of those claims for which the Barry Lane Property was sold free and clear of pursuant to 11 U.S.C. § 363(f). It is anticipated that the Chapter 7 Trustee will file a motion to seek approval of the Agreement pursuant to Federal Rule of Bankruptcy Procedure 9019 within the next 7-10 days.

Thereafter, if the Agreement is approved, Debtor will seek dismissal of this Bankruptcy Case and approval of administrative claims on the same hearing date.

Based on the foregoing, Debtor respectfully requests that the Court continue this status conference for approximately 60 days, which should provide sufficient time to: (a) obtain approval of the Agreement with the Chapter 7 Trustee; (b) file a Motion to Dismiss this Bankruptcy Case; and (c) file a First and Final Application for Compensation for Meyer Law Group, LLP.

Dated: July 22, 2024

MEYER LAW GROUP LLP

By: /s/ BRENT D. MEYER

Brent D. Meyer
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66 BARRY LANE, LLC